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May 20, 2022

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

VIA ECF

Re: United States vs. Tatiana LaForest
CASE NO. 21-CR-272 CM

Dear Judge McMahon:

As the Court is aware, I represent the above named defendant, Tatiana LaForest. At this time, we are hereby requesting a modification of bond. Currently Ms. LaForest's travel is restricted to the Eastern and Southern District of New York. We respectfully request that Ms. LaForest be permitted to travel this Sunday, May 22, 2022 to Tuesday, May 31, 2022 to attend her cousin's graduation at Learning World Academy in Miami FL. She will be staying at her parents' home at 6805 NW 70th Place, Parkland, FL. I have spoken AUSA Matthew Shahabian, as well as Pretrial Services Officer Laura Gialanella, who have no objection to this request.


Thank you for your anticipated consideration in this matter. If you have any questions please feel free to contact my office.

Yours Truly,

s/Barry Goldberg

Barry Goldberg, Esq.

SO ORDERED:


for Honorable Colleen McMahon

CC: AUSA MATTHEW SHAHABIAN,
PRETRIAL SERVICES OFFICER LAURA GIALANELLA